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11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
SAN JOSE DIVISION

13 In re

Case No. 21-50028 SLJ

14 EVANDER FRANK KANE

Chapter 7

15 Debtor.

16
17 **STIPULATION TO ENLARGE TIME PERIODS FOR CENTENNIAL TO FILE MOTION**
TO DISMISS CASE UNDER 11 U.S.C. § 707(b) AND/OR COMPLAINT TO OBJECT TO
18 **DISCHARGE UNDER 11 U.S.C. § 727 TO MAY 5, 2021**

19 Centennial Bank, an Arkansas state chartered bank ("Centennial"), by and through its
20 undersigned counsel, and the Debtor Evander Frank Kane (the "Debtor"), by and through his
21 undersigned counsel, both of whom are together referred to herein as the "Parties," hereby stipulate
22 to the entry of an order extending the April 5, 2021, deadline to seek dismissal of the above-
23 captioned bankruptcy case (this "Bankruptcy") and/or to file a complaint to object to the Debtor's
24 discharge, as previously set by court order, to May 5, 2021 (the "Stipulation").

25 This Stipulation is based on the following facts:

- 26 1. The Debtor filed his petition for relief under chapter 7 on January 9, 2021.
- 27 2. Centennial is listed as a secured creditor in this Bankruptcy with an asserted claim
28 of approximately \$8,360,000.

1 3. The first "Meeting of Creditors" in this Bankruptcy was initially held on February 3,
2 2021, and continued and concluded on February 23, 2021.

3 4. Centennial is investigating whether it is appropriate to seek dismissal of this
4 Reorganization for abuse under 11 U.S.C. § 707(b) as well as whether it is appropriate to file an
5 adversary proceeding to object to discharge under 11 U.S.C. § 727.

6 5. The deadline for Centennial to file a motion to dismiss for abuse pursuant to 11
7 U.S.C. § 707(b) or an adversary complaint to object to discharge under 11 U.S.C. § 727 expires on
8 April 5, 2021.

9 6. The Parties hereby stipulate to extend the time for Centennial to file a motion to
10 dismiss under 11 U.S.C. § 707(b) and an adversary complaint to object to discharge under 11 U.S.C.
11 § 727 to and including May 5, 2021.

12 7. The Parties request that this Court enter an order approving this Stipulation.

13 Dated March 17, 2021

FINESTONE HAYES LLP

15 /s/ Stephen D. Finestone

16 Stephen D. Finestone
17 Attorneys for Debtor
 EVANDER FRANK KANE

18 DATED: March 16, 2021

ANTHONY & PARTNERS, LLC

20 /s/ John A. Anthony

21 JOHN A. ANTHONY
 Attorneys for Creditor CENTENNIAL BANK

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